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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

PETER POLL,

Plaintiff,

vs.

RONALD A. MOTZKUS AND
MONUMENT TITLE INSURANCE, INC.

Defendants

Case No.: 2:21-cv-01591-JCM-DJA

**STIPULATION AND ORDER TO
EXTEND JOINT PRETRIAL ORDER
DEADLINES (FIRST REQUEST)**

Plaintiff, PETER POLL, and Defendants RONALD MOTZKUS and MONUMENT TITLE INSURANCE, INC., by and through their respective counsel of record, do hereby stipulate to extend the joint pretrial order deadlines in the current scheduling order and discovery plan in this matter for a period of sixty (60) days to accommodate for a settlement conference as more fully explained below.

Pursuant to Local Rule IA 6-1(a), the parties hereby state that this is the first such discovery extension requested in this matter.

DISCOVERY COMPLETED TO DATE PURSUANT TO LR 26-3(a)

1. Plaintiff and Defendants have served their initial disclosures.
2. Plaintiff has made disclosures as required by FRCP 26.
3. Defendants made their FRCP 26 initial disclosures on May 14, 2024.

4. Defendants supplemented their FRCP 26 initial disclosures on October 11, 2024.
5. Defendants supplemented their FRCP 26 initial disclosures on October 16, 2024.
6. Defendants supplemented their FRCP 26 initial disclosures on October 24, 2024.
7. Plaintiff served Interrogatories and Requests for Production on Defendants RONALD A. MOTZKUS and MONUMENT TITLE INSURANCE, INC.
8. Defendants RONALD A. MOTZKUS and MONUMENT TITLE INSURANCE, INC. have answered Plaintiff's Interrogatories and Requests for Production. Plaintiff has conducted a meet and confer and Defendants supplemented these responses.
9. Defendants Ronald A. Motzkus issued Requests for Production to Plaintiff, to which Plaintiff responded.
10. Plaintiff issued Subpoenas to Produce Documents to the following third parties:
 - a) GVRE, LLC
 - b) Home Title, Inc.
 - c) Fidelity National Title Agency of Nevada, Inc.
 - d) Old Republic Title Co. of Nevada
 - e) First American Title Insurance Co.
 - f) Juan Lopez – Lopez Real Estate Group
11. The deposition of Plaintiff Peter Poll was taken.
12. The deposition of Defendant Ronald Motzkus was taken.
13. The deposition of Paulette Malpica-Ortiz was taken.
14. The deposition of Defendant Veronica Ruggeri Foran was taken.

DISCOVERY TO BE COMPLETED PURSUANT TO LR 26-3(b)

None.

REASONS FOR EXTENSION PURSUANT TO LR 26-3(c)

The parties represent that good cause exists for the request pursuant to LR IA 6-1 and LR 26-4. In an attempt to resolve this matter prior to trial, the parties have agreed to participate in a

private mediation with Judge Jennifer Togliatti at Advanced Resolution Management. Said mediation is currently scheduled for March 4, 2025. The deadline for the proposed Joint Pretrial Order is December 18, 2024. The parties are requesting a sixty (60) day continuance of the Joint Pretrial Order deadline. The parties have acted in good faith to request this extension and have no intent, nor reason, to delay the resolution of this matter.

NEW DISCOVERY DEADLINES PURSUANT TO LR 26-3(d)

| | <u>Current Deadline</u> | <u>New Deadline</u> |
|--|-------------------------|---------------------|
| Deadline for Expert Witnesses | Closed | Closed |
| Deadline to Amend Pleadings or Add Parties | Closed | Closed |
| Deadline for Rebuttal Experts | Closed | Closed |
| Discovery Deadline | Closed | Closed |
| Deadline to file dispositive motions | Closed | Closed |
| Proposed Joint Pre-Trial Order | December 18, 2024 | February 18, 2025 |

The parties represent that this request for extension of the dispositive motions and Joint Pretrial Order deadlines is made by the parties in good faith and not for the purpose of delay.

Dated this 18th day of December 2024.

Dated this 18th day of December 2024.

CORY READE DOWS & SHAFER

SNELL & WILMER, L.L.P.

By: /s/ Jay A. Shafer

By: /s/ Aleem A. Dhalla

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IT IS SO ORDERED.

Dated this 19th day of December, 2024


UNITED STATES MAGISTRATE JUDGE